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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

TRONOX INCORPORATED, *et al.*,

Debtors.

TRONOX INCORPORATED, TRONOX  
WORLDWIDE LLC f/k/a Kerr-McGee  
Chemical Worldwide LLC, and TRONOX  
LLC f/k/a Kerr-McGee Chemical LLC,

Plaintiffs,

v.

ANADARKO PETROLEUM  
CORPORATION AND KERR-MCGEE  
CORPORATION,

Defendants.

Chapter 11

Case No. 09-10156 (ALG)

Jointly Administered

Adversary Proceeding No. 09-01198 (ALG)

THE UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

TRONOX, INC., TRONOX  
WORLDWIDE LLC, TRONOX LLC,  
KERR-MCGEE CORPORATION, and  
ANADARKO PETROLEUM  
CORPORATION,

Defendants.

**AMENDED NOTICE OF DEFENDANTS  
ANADARKO PETROLEUM CORPORATION'S AND  
KERR-MCGEE CORPORATION'S MOTION TO COMPEL THE PRODUCTION OF  
DOCUMENTS BY PLAINTIFF-INTERVENOR THE UNITED STATES OF AMERICA**

PLEASE TAKE NOTICE, that upon the Motion, dated July 9, 2010 (the "Motion"), the Memorandum of Law, dated July 9, 2010, the Declaration of Duke K. McCall, III, executed on July 9, 2010, the Declaration of Jason W. Billeck, executed on July 9, 2010, the Declaration of David M. Halverson, executed on July 9, 2010, and the Declaration of Jason E. Glass, executed on July 9, 2010 (all previously filed with the original Notice of Motion), and upon all prior proceedings herein, Defendants Anadarko Petroleum Corporation and Kerr-McGee Corporation (collectively, the "Defendants"), by their undersigned attorneys, will move for an order, pursuant to Fed. R. Civ. P. 34 and 37 (as incorporated by Federal Rules of Bankruptcy Procedure 7034 and 7037), compelling the production of documents by Plaintiff-Intervenor the United States of America, and granting such other and further relief as this Court deems just and necessary. A hearing will be held before the Honorable Allan L. Gropper, United States Bankruptcy Judge, in Room 617 of the United States Bankruptcy Court for the Southern

District of New York, One Bowling Green, New York, New York 10004, on November 9, 2010 at 11:00 a.m. (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, set forth the legal and factual basis therefor, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and served in accordance with General Order M-242, and on (i) the chambers of the Honorable Allan L. Gropper, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil, Gotshal & Manges LLP, attorneys for the Defendants, 767 Fifth Avenue, New York, New York 10153 (Attn: Richard A. Rothman, Esq., Bruce S. Meyer, Esq., and Lori L. Pines, Esq.) and 700 Louisiana, Suite 1600, Houston, Texas, 77002 (Attn: Melanie Gray, Esq., Lydia Protopapas, Esq., and Jason W. Billeck, Esq.); (iii) Bingham McCutchen LLP, attorneys for the Defendants, 355 South Grand Avenue, Suite 4400, Los Angeles, California 90071 (Attn: James J. Dagna, Esq.), and 2020 K Street, NW, Washington, DC 20006 (Attn: Duke K. McCall III, Esq.); (iv) Pillsbury Winthrop Shaw Pittman LLP, attorneys for the Official Committee of Equity Holders of Tronox Inc., 1540 Broadway, New York, New York 10036 (Attn: David A. Crichlow, Esq.); (v) Kasowitz, Benson, Torres & Friedman LLP, attorneys for the Official Committee of Unsecured Creditors, 1633 Broadway, New York, New York 10019 (Attn: David M. Friedman, Esq.); (vi) the United States Attorneys

Office, 86 Chambers Street, New York, New York 10007 (Attn: Joseph Pantoja, Esq.); and,  
(vii) the Office of the United States Trustee, 33 Whitehall Street, 21st Floor, New York, New  
York 10004 (Attn: Susan D. Golden), so as to be filed and received no later than 4:00 p.m.  
(Prevailing Eastern Time), October 19, 2010 (the “Objection Deadline”).

If no objections are timely filed and served with respect to the Motion, the Court  
may enter the order attached hereto with no further notice or opportunity to be heard or offered  
to any party.

New York, New York

<p>Dated: September 8, 2010</p>  <p>/s/ Melanie Gray</p> <hr/> <p>Melanie Gray (admitted pro hac vice) Lydia Protopapas (LP 8089) Jason W. Billeck (admitted pro hac vice) WEIL, GOTSHAL &amp; MANGES LLP 700 Louisiana, Suite 1600 Houston, Texas 77002 Telephone: (713) 546-5000 Facsimile: (713) 224-9511</p> <p>Richard A. Rothman (RR 0507) Bruce S. Meyer (BM 3506) Lori L. Pines (LP 3005) WEIL, GOTSHAL &amp; MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007</p>	<p>Respectfully submitted,</p>  <p>/s/ Duke McCall, III</p> <hr/> <p>Thomas R. Lotterman (admitted pro hac vice) Duke K. McCall, III BINGHAM MCCUTCHEN LLP 2020 K Street, NW Washington, DC 20006-1806 202.373.6000 202.373.6001(fax) thomas.lotterman@bingham.com duke.mccall@bingham.com</p> <p>James J. Dragna (admitted pro hac vice) BINGHAM MCCUTCHEN LLP 355 South Grand Avenue, Suite 4400 Los Angeles, California 90071 Telephone: (213) 680-6400 Facsimile: (213) 680-6499</p> <p><i>Counsel for Anadarko Petroleum Corporation and Kerr-McGee Corporation</i></p>
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